



**DEPARTMENT OF ENVIRONMENT AND CONSERVATION
TENNESSEE DIVISION OF AIR POLLUTION CONTROL
ANNUAL INSPECTION**

Reference No.: 01-0234
State Class: CM
Pollutant(s): PM, VOC & HAP

Environmental Specialist: MLC
Route To: CMW

Date Inspected: May 3, 2011

Company: Shawmut Advanced Material Solutions
Location address: 325 J.D. Yarnell Industrial Parkway
City/State/Zip: Clinton, Tennessee
Mailing Address, if different:

Company Contact/Title: Kevin Souza
Phone: (508) 588-3300 xt 344

Does Company impact an additional control area? YES/NO: No
If Yes, pollutant type:

Does Company have: NSPS (Part 60)? No PSD? No
 NESHAPS (Part 61)? No MACT (Part 63)? No

If YES, give subpart for NSPS, NESHAPS, MACT

Sources If YES to any, indicate point number(s):

Date of the last annual inspection: May 7, 2010

Time period covered by this inspection, from: January 2010 to March 2011

Is inspection partial or comprehensive? Comprehensive

Total time required for this inspection (hours): 11.5

Was company in compliance during entire inspection time period? No

If NO, explain in final paragraph

If CM source: **Date annual report received in EFO:** April 5, 2011
 Date annual report review complete/acknowledged by EFO: April 25, 2011
 Did annual report have deviations from permit conditions (Y/N)? No

EXECUTIVE SUMMARY:

On May 3, 2011, Martie Carpenter met with Mr. Kevin Souza and Mr. Larry Lovell to conduct the 2010-2011 annual inspection at Shawmut Advanced Material Solutions in Clinton, Tennessee. Shawmut manufactures textile material for the automotive and boating industry. The facility is permitted for three laminators. The laminators apply flexible polyurethane foam to fabric, film or vinyl. The facility also has an electric Hot Melt Laminator that uses no VOCs or HAPs.

The facility is classified as a Conditional Major Source. The facility was issued a Conditional Major Permit on February 15, 2008 that expires on February 1, 2018. The facility is permitted for three natural gas-fired flame laminators. During the 2008-2009 inspection period, a comprehensive inspection was conducted on June 10, 2009. The facility was out of compliance and a NOV was issued on June 19,

2009 for not notifying the Division of the responsible official change. During the 2009-2010 inspection period, a partial inspection (records review) was conducted on May 7, 2010. The facility was found in compliance. During the 2010- 2011 annual inspection period, a comprehensive inspection was conducted on May 3, 2011. The Mercury Product Disposal Control Act was e-mailed to Mr. Souza on May 6, 2011.

Conditional Major Permit #461613P

Date Issued: February 15, 2008

Date Expires: February 1, 2018

Textile Production

Natural gas-fired flame laminators

A pinhole dye tester with each laminator

Condition 1: Justin Keppy is not the responsible official to represent and bind the facility in environmental permitting affairs. Mr. Keppy ceased being the responsible official in late 2008. On June 18, 2009, the facility notified the Division that Kevin Souza was the responsible official.

Condition 5: Visible emissions from the source shall not exceed 20% opacity as determined by EPA Method 9. During the on-site inspection, the inspector did not observe any visible emissions from the stacks.

Condition 6: VOCs emitted from this facility shall not exceed 24 tons during all intervals of 12 consecutive months. The records were reviewed from January 2010 to March 2011. The highest twelve-month interval occurred in January 2010 with 0.3498 tons of VOC being emitted.

Condition 7: Emissions of any HAP shall not exceed 15.30 pounds per hour of HCL on a monthly average basis and 9.0 tons during all intervals of 12 consecutive months. Emissions of any combination of HAPs shall not exceed 24 tons during all intervals of 12 months. The highest monthly average for HCL occurred in September 2010 with 0.0716 tons being emitted. The highest twelve-month for HCL occurred in August 2010 with 0.7671 tons being emitted. HCL is the only HAP emitted at the facility.

Condition 8: The Division has not required the facility to show proof of compliance with the emissions for Particulate matter, Volatile content and Hydrochloric Acid by EPA Method 5, 24 and 26, respectively.

Condition 9: The facility maintains a record of the purchase order and invoices of all VOC and HAP containing materials. The purchase orders and invoices are maintained at the Corporate Office in West Bridgewater, Massachusetts. The records were e-mailed and reviewed on May 5, 2011.

Condition 10: The facility maintains a tabular format of the as-supplied VOC content of all VOC-containing materials.

Condition 11: The facility must calculate the actual quantities of VOC and HAPs emitted from this facility during each calendar month.

Log1 – monthly emissions from the laminators

Log2- VOCs and HAPs from other operations at the facility

Log3- 12 consecutive month summary

The facility maintains the required records. The records were reviewed from January 2010 to March 2011.

Condition 13: The annual report must be submitted by March 31st every year. The 2010 annual report was not received in the Knoxville Office until April 5, 2011. A NOV was issued on April 28, 2011 for the violation.

Condition 14: The permit does not expire until February 1, 2018.

01- Natural gas-fired flame laminator used for textile production

Condition 15: Only natural gas is used as the fuel source for the laminator.

Condition 16: Particulate matter emitted from this source shall not exceed 5.27 pounds per hour based on a monthly average. The records were reviewed from January 2010 to March 2011. The highest monthly average for Particulate matter emissions occurred in January 2010 with 0.87 pounds/hour being emitted.

Condition 17: Hydrochloric acid emissions shall not exceed 5.10 pounds per hour based on a monthly average. The records were reviewed from January 2010 to March 2011. The highest monthly average for Hydrochloric acid emissions occurred in January 2010 with 1.06 pounds/hour being emitted.

Condition 18: The Hydrogen Chloride (HCL) exhaust gases from the N.G. laminator stacks shall be discharged unobstructed vertically upwards to the ambient air from each stack with an exit diameter of 2.33 feet no less than 46 feet above ground level. The facility has not made any changes to the stack.

02- Natural-gas fired flame laminator used for textile production

Condition 19: Only natural gas is used as the fuel source.

Condition 20: Particulate matter emitted from this source shall not exceed 5.27 pounds per hour based on a monthly average. The records were reviewed from January 2010 to March 2011. The highest monthly average for Particulate matter emissions occurred in March 2010 with 0.60 pounds/hour being emitted.

Condition 21: Hydrochloric acid emissions shall not exceed 5.10 pounds per hour based on a monthly average. The records were reviewed from January 2010 to March 2011. The highest monthly average for Hydrochloric acid emissions occurred in March 2010 with 0.74 pounds/hour being emitted.

Condition 22: The Hydrogen Chloride (HCL) exhaust gases from the N.G. laminator stacks shall be discharged unobstructed vertically upwards to the ambient air from each stack with an exit diameter of 2.33 feet no less than 46 feet above ground level. The facility has not made any changes to the stack.

03- Natural-gas fired flame laminator used for textile production

Condition 23: Only natural gas is used as the fuel source.

Condition 24: Particulate matter emitted from this source shall not exceed 5.27 pounds per hour based on a monthly average. The records were reviewed from January 2010 to March 2011. The highest monthly average for Particulate matter emissions occurred in August 2010 with 2.12 pounds/hour being emitted.

Condition 25: Hydrochloric acid emissions shall not exceed 5.10 pounds per hour based on a monthly average. The records were reviewed from January 2010 to March 2011. The highest monthly average for Hydrochloric acid emissions occurred in August 2010 with 2.52 pounds/hour being emitted.

Condition 26: The Hydrogen Chloride (HCL) exhaust gases from the N.G. laminator stacks shall be discharged unobstructed vertically upwards to the ambient air from each stack with an exit diameter of 2.33 feet no less than 46 feet above ground level. The facility has not made any changes to the stack.

NOV

The facility is required to submit an annual report by March 31, 2011. The annual report was not submitted until April 5, 2011. On April 28, 2011, the facility was issued a Notice of Violation- No Further Action letter for the late submittal.

Based upon the file review, the site inspection, and the review of the records, it is the conclusion of this inspector that Shawmut Corporation is out of compliance in that there was a compliance problem found and a Notice of Violation was issued.

Martine L. Carpenter
Inspector's Name

VEE Certification Number: 1488
Certification Expiration Date: 09/24/11

I verify that the format and content of this report conforms to established TN Division of Air Pollution Control annual inspection standard operational procedures guidance and that the compliance determination made in this report is correct.

Martine L. Carpenter
Supervisor/Manager

5/6/11
Date